

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : DATE FILED: _____

SEIDE VENORD : VIOLATIONS:

- : **18 U.S.C. § 1956(a)(3)**
(laundering monetary instruments - 43 counts)
- : **18 U.S.C. § 2**
(aiding, abetting, procuring, and causing)
- : **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH FORTY-THREE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant SEIDE VENORD was the owner and operator of VENORD Multiple Services (VMS), located at 4922 North 5th Street, Philadelphia, Pennsylvania. VMS is a money transfer center, offering domestic and international money transmitting services to the public, in addition to check cashing, money orders, translation, immigration counseling, and automobile registration services.

2. Defendant SEIDE VENORD was a licensed money transmitter for Western Union, Vigo Remittance, and Girosol Corporation, all money transmitters licensed in the state of Pennsylvania. Western Union, Vigo Remittance Company, and Girosol Corporation have more that 25,000 money transfer locations throughout the United States and they are required to

comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. § 5311 et. seq.

3. Western Union, Vigo Remittance Company and Girosol Corporation provide training to each of their agents on the money laundering laws and currency reporting requirements. These companies provide manuals and updates to all of their agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

4. Defendant SEIDE VENORD received training manuals and other documentation and information from Western Union, Vigo Remittance, and Girosol Corporation regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act. Defendant VENORD retained these training manuals and other documents and information on the premises of VMS.

5. Defendant SEIDE VENORD conducted financial transactions which were represented to him by a cooperating witness (CW), working at the direction of federal officials, to be the proceeds of illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendant VENORD arranged for international transfers of money and exchanged blank money orders for cash. Defendant VENORD structured the transactions to evade and defeat the currency transaction reporting requirements and permitted the use of false identification and fictitious names to prevent discovery of the sender's true identity and to evade the reporting requirements.

6. On or about the dates set forth below, in Philadelphia, in the Eastern

District of Pennsylvania, defendant

SEIDE VENORD

knowingly conducted and aided and abetted the following financial transactions affecting interstate commerce:

COUNT	DATE	AMOUNT LAUNDERED	DEFENDANT'S FEE	WIRE TRANSFER COMPANY FEE(S)
1	8-29-03	\$4,000.00 wired	\$200.00	\$326.00
2	9-10-03	\$3,000.00 wired	\$250.00	\$246.00
3	9-25-03	\$4,000.00 wired	\$400.00	\$326.00
4	9-30-03	\$4,000.00 wired	\$400.00	\$326.00
5	10-10-03	\$3,000.00 wired	\$500.00	\$246.00
6	10-21-03	\$4,000.00 wired	\$400.00	\$326.00
7	10-30-03	\$4,000.00 wired (split into 2 separate wire transfers)	\$500.00	\$311.00
8	11-20-03	\$4,000.00 wired	\$600.00	\$326.00
9	12-5-03	\$4,000.00 wired	\$400.00	\$326.00
10	1-8-04	\$4,000.00 wired \$1,000.00 exchanged for money orders	\$500.00	\$326.00
11	1-26-04	\$4,000.00 wired \$2,000.00 exchanged for money orders	\$574.00	\$326.00
12	2-5-04	\$4,000.00 wired \$4,000.00 exchanged for money orders	\$624.00	\$326.00
13	2-13-04	\$4,000.00 wired \$4,100.00 exchanged for money orders	\$674.00	\$326.00

COUNT	DATE	AMOUNT LAUNDERED	DEFENDANT'S FEE	WIRE TRANSFER COMPANY FEE(S)
14	2-20-04	\$4,300.00 wired \$3,900.00 exchanged for money orders	\$750.00	\$350.00
15	2-27-04	\$4,700.00 wired (split into 2 separate wire transfers) \$3,500.00 exchanged for money orders	\$700.00	\$310.00
16	3-5-04	\$4,000.00 wired \$5,000.00 exchanged for money orders	\$814.00	\$326.00
17	3-12-04	\$4,000.00 wired \$5,000.00 exchanged for money orders	\$834.00	\$326.00
18	3-19-04	\$4,100.00 wired \$5,000.00 exchanged for money orders	\$846.00	\$334.00
19	4-7-04	\$4,000.00 wired (split into 2 separate wire transfers) \$5,000.00 exchanged for money orders	\$900.00	\$332.00
20	4-15-04	\$4,200.00 wired (split into 2 separate wire transfers) \$5,000.00 exchanged for money orders	\$800.00	\$348.00
21	4-22-04	\$4,400.00 wired	\$362.00	\$358.00
22	4-30-04	\$3,700.00 wired (split into 2 separate wire transfers) \$3,500.00 exchanged for money orders	\$700.00	\$302.00
COUNT	DATE	AMOUNT LAUNDERED	DEFENDANT'S FEE	WIRE TRANSFER COMPANY FEE(S)

23	5-6-04	\$3,800.00 wired (split into 2 separate wire transfers) \$4,000.00 exchanged for money orders	\$750.00	\$310.00
24	5-14-04	\$3,000.00 wired \$4,000.00 exchanged for money orders	\$754.00	\$246.00
25	5-20-04	\$1,800.00 wired \$4,000.00 exchanged for money orders	\$656.00	\$144.00
26	5-28-04	\$2,000.00 wired \$4,500.00 exchanged for money orders	\$684.00	\$166.00
27	6-3-04	\$1,500.00 wired \$5,000.00 exchanged for money orders	\$680.00	\$120.00
28	6-14-04	\$995.00 wired \$5,500.00 exchanged for money orders	\$715.00	\$85.00
29	7-1-04	\$2,000.00 wired \$4,000.00 exchanged for money orders	\$654.00	\$166.00
30	7-20-04	\$2,000.00 wired \$2,500.00 exchanged for money orders	\$554.00	\$166.00
31	7-29-04	\$1,000.00 wired \$2,500.00 exchanged for money orders	\$315.00	\$85.00
32	8-6-04	\$2,000.00 wired \$2,500.00 exchanged for money orders	\$534.00	\$166.00
COUNT	DATE	AMOUNT LAUNDERED	DEFENDANT'S FEE	WIRE TRANSFER COMPANY FEE(S)

33	8-13-04	\$4,000.00 wired \$3,000.00 exchanged for money orders	\$614.00	\$326.00
34	8-20-04	\$5,000.00 wired (split into 2 separate wire transfers) \$4,000.00 exchanged for money orders	\$698.00	\$412.00
35	9-10-04	\$3,000.00 wired \$4,000.00 exchanged for money orders	\$754.00	\$246.00
36	9-17-04	\$3,000.00 wired \$3,000.00 exchanged for money orders	\$554.00	\$246.00
37	9-24-04	\$6,000.00 wired (split into 2 separate wire transfers) \$5,100.00 exchanged for money orders	\$908.00	\$492.00
38	9-30-04	\$3,200.00 wired (split into 2 separate wire transfers) \$2,500.00 exchanged for money orders	\$553.00	\$267.00
39	10-7-04	\$4,000.00 wired (split into 2 separate wire transfers) \$2,500.00 exchanged for money orders	\$568.00	\$332.00
40	10-15-04	\$2,600.00 wired (split into 2 separate wire transfers) \$2,500.00 exchanged for money orders	\$481.00	\$219.00
COUNT	DATE	AMOUNT LAUNDERED	DEFENDANT'S FEE	WIRE TRANSFER COMPANY FEE(S)

41	11-12-04	\$3,100.00 wired (split into 2 separate wire transfers) \$2,900.00 exchanged for money orders	\$641.00	\$259.00
42	11-23-04	\$3,000.00 wired (split into 2 separate wire transfers) \$2,900.00 exchanged for money orders	\$489.00	\$251.00
43	12-2-04	\$4,900.00 wired (split into 3 separate wire transfers) Total: \$267,195.00	\$257.00	\$393.00

7. When conducting the financial transactions described in paragraph 6 above, defendant SEIDE VENORD acted with the intent to conceal and disguise the nature, location, source, ownership and control of what he believed were the proceeds of the specified unlawful activity, and with the intent to promote the carrying on of such specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(3) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956(a)(3) described in this indictment, defendant

SEIDE VENORD

shall forfeit to the United States any and all property, real or personal, involved in those violations, or any property traceable to such property, including, but not limited to, the following:

- a. Approximately \$4,660.00 in United States currency seized from the business; and
- b. Approximately \$37,685.00, the value of the fees paid.

2. In the event the forfeitable property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to

seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY